

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

TATIA LIPE,

Plaintiff,

v.

1:23-cv-00899-GBW-JMR

ALBUQUERQUE PUBLIC SCHOOLS
and NEW MEXICO DEPARTMENT
OF PUBLIC EDUCATION,

Defendants.

NOTICE OF DEPOSITION OF ANTOINETTE ROMERO

TO: Antoinette Romero, School Social Worker
Albuquerque Public Schools
c/o Karen Kilgore, Esq.
Cuddy & McCarthy, LLP
1701 Old Pecos Trail
P.O. Box 4160
Santa Fe, NM 87502
kkilgore@cuddymccarthy.com
Attorney for Defendant APS

PLEASE TAKE NOTICE that, pursuant to Rules 26, 30, and 32 of the Federal Rules of Civil Procedure and the Local Rules of the United States District Court for the District of New Mexico, Plaintiff, by and through counsel, Boglarka Foghi, (FOGHI LAW FIRM, LLC), will take the deposition upon oral examination of **Antoinette Romero**.

The deposition will be recorded stenographically before a certified court reporter at **Gateway Financial Services, 6000 Uptown Blvd NE, Albuquerque, New Mexico**, on **September 5, 2025**, commencing at **1:00 p.m.** The examination will concern matters relevant to the claims and defenses in this action.

Ms. Romero is an employee of Defendant Albuquerque Public Schools. Because this notice is directed to a party-affiliated witness, any documents sought for use at the deposition are requested and will be produced through party discovery under Rule 34. This notice does not independently compel the individual deponent to bring documents. Counsel should ensure that any responsive materials intended to be used at the deposition are produced in advance through the parties' ongoing discovery obligations.

Nothing in this notice seeks materials protected by attorney-client privilege or work product, and any withholding shall be addressed via the parties' discovery obligations, including logging as required. After good faith consultation with opposing counsel regarding scheduling, this deposition has been noticed for the above date and time.

Respectfully submitted,

/s/ Boglarka Foghi, Esq

Boglarka Foghi, Attorney for Petitioner

FOGHI LAW FIRM, LLC

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Notice was electronically filed through the CM/ECF on the 13th day of August 2025 which causes service to the following:

Karen Kilgore, Esq.
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Attorney for Defendant APS

/s/ Boglarka Foghi, Esq.
Boglarka Foghi, Attorney at Law